

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Action No. 3:20-CV-710-FDW-DSC**

HAYWARD INDUSTRIES, INC.,

Plaintiff,

v.

BLUEWORKS CORPORATION,  
BLUEWORKS INNOVATION  
CORPORATION, NINGBO C.F.  
ELECTRONIC TECH CO., LTD; NINGBO  
YISHANG IMPORT AND EXPORT CO.,  
LTD.

Defendants.

**MOTION TO WITHDRAW – W. CLARK  
GOODMAN**

Pursuant to Local Civil Rule 83.1(f), W. Clark Goodman of the firm of Womble Bond Dickinson (US) LLP hereby moves this Court for an Order allowing his withdrawal as counsel for Plaintiff Hayward Industries, Inc. In support of this Motion, moving counsel shows the Court:

1. Effective January 1, 2023, W. Clark Goodman will no longer practice law at Womble Bond Dickinson (US) LLP.
2. This Motion pertains solely to Mr. Goodman, individually, and there will be no interruption or disruption in the representation of Plaintiff in this matter. The remaining counsel of record for Plaintiff, including Russ Ferguson of Womble Bond Dickinson of Womble Bond Dickinson (US) LLP, will continue to represent Plaintiff in this matter and all notifications to Plaintiff can be directed to remaining counsel through the contacts already registered with the ECF system.

3. Counsel for Defendants has been consulted and does not object to Mr. Goodman's withdrawal.

WHEREFORE, W. Clark Goodman respectfully requests that the Court enter an Order allowing this Motion to Withdraw and that W. Clark Goodman (N.C. Bar No. 19927) be removed from the service list for this action.

This is the 28<sup>th</sup> day of December, 2022.

/s/ W. Clark Goodman

W. Clark Goodman (N.C. State Bar No. 19927)

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*Attorney for Plaintiff Hayward Industries, Inc.*